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Lead Counsel for Plaintiffs and Class

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CARLOS MUNOZ, INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED,

Plaintiff,

vs.

CHINA EXPERT TECHNOLOGY, INC.,

Defendant.

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No.: 07-CV-10531 (AKH)

LEAD PLAINTIFFS'
NOTICE OF MOTION FOR
ORDER DECLARING THE
PSLRA DISCOVERY STAY

IS NO LONGER IN EFFECT

PLEASE TAKE NOTICE that Lead Plaintiffs CXTI Investors (the "Plaintiffs") hereby move this Court, the Honorable Alvin K. Hellerstein, United States District Judge, for an order:

- (a) declaring that the stay of discovery, as set forth in Section 21D of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 ("PSLRA") 15 U.S.C.A. § 78u-4(b)(3)(B), is no longer in effect; and
- (b) allowing Plaintiffs to engage in any discovery as permitted under the Federal Rules of Civil Procedure, including but not limited to document requests, interrogatories, and depositions.

In support of this Motion, Plaintiffs submit: (1) the Declaration of Phillip Kim dated March 31, 2008; (2) Memorandum of Law dated March 31, 2008; and (3) a [Proposed] Order declaring the PSLRA discovery stay to be no longer in effect annexed hereto.

Dated: March 31, 2008 Respectfully submitted,

By: /s/ Phillip Kim
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